

EL

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

Vamsidhar R. Vurimindi
313 Arch St., Unit #607
Philadelphia, PA 19106

Plaintiff

Civil Action

NO: 10 00088

V.

City of Philadelphia
1515 Arch Street
Philadelphia, PA 19102

Formerly
Court of Common Pleas
Philadelphia County
Trial Division – Civil
December 2009
No. 000622

Commissioner Frances Burns
1401 JFK Blvd., 11th Floor, Philadelphia, PA 19102

Police Officer Edward Devlin
1401 JFK Blvd., 11th Floor, Philadelphia, PA 19102

Police Officer Michael Curran
1401 JFK Blvd., 11th Floor, Philadelphia, PA 19102

Police Officer Scott Melderek
1401 JFK Blvd., 11th Floor, Philadelphia, PA 19102

Phila. City Planning Commission
One Parkway, 13th Flr., 1515 Arch St., Phila., PA 19102

FNA Zoning Committee
P.O. Box 29292, Phila., PA 19125

Zoning Board of Adjustment,
1401 JFK Blvd., Rm 1130, Phila., PA 19102

Richard Levins, President NKCDC
2515 Frankford Ave., Phila., PA 19125

New Kensington, CDC
2515 Frankford Ave., Phila., PA 19125

Terry Gillen, Exe. Dir. Redevelopment Authority
1234 Market St., 16th Flr., Phila., PA 19107

John Coates, Dir, OHCD
1234 Market St., 16th Flr., Phila., PA 19107

Phila. Commission on Human Relations (PCHR)
Curtis Ctr. Ste. 300, South 601 Walnut St., Phila., PA 19106

Michael Nutter
City Hall, Phila., PA 19107

EL

Board of Revision of Taxes
Curtis Ctr., Ste. 300, 601 Walnut St., Phila., PA 19106

Commissioner of Public Property
City Hall, Phila., PA 19107

10 0088

Office of the 5th District Councilman
City Hall, Rm 484, Phila., PA 19107

Office of the Housing & Community Development
1234 Market St., 16th Flr., Phila., PA 19107

Redevelopment Authority
1234 Market St., 16th Flr., Phila., PA 19107

Defendants

NOTICE OF REMOVAL

To the Honorable Judges of the United States District Court for the Eastern District of Pennsylvania.

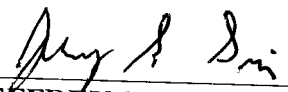
Pursuant to 28 U.S.C. § 1441, defendants, City of Philadelphia, et al. (hereinafter "petitioners") through their counsel, Jeffrey S. Simons, Assistant City Solicitor, respectfully petition for the removal of this action to the United States District Court for the Eastern District of Pennsylvania. In support thereof, defendants state the following:

1. On December 2009, plaintiff initiated this action by a Complaint in the Court of Common Pleas in Philadelphia, December 2009, No. 000622. (Exhibit A - Complaint).
2. On January 4, 2010, said Complaint was served on Petitioners at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.
3. Plaintiff alleges that on November 4, 2005, he sustained damages when his civil rights were violated by the defendants. (Exhibit A).
4. This action may be removed to this Court pursuant to 28 U.S.C. § 1441 since Plaintiff's Complaint contains allegations of violations of the plaintiff's Federal Civil Rights and seeks relief under 42 U.S.C. § 1983. (Exhibit A)

Wherefore, petitioners, City of Philadelphia, et al. respectfully request that the captioned Complaint be removed to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

Craig Straw
Chief Deputy City Solicitor


JEFFREY S. SIMONS
Assistant City Solicitor
Attorney I.D. No. 93784
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
215-683-5443

Date: 1/8/10

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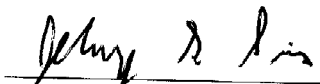
Defendants

NOTICE OF FILING OF REMOVAL

TO: Vamsidhar R. Vurimindi
313 Arch St., Unit #607
Philadelphia, PA 19106

PLEASE TAKE NOTICE THAT on January 8, 2010, defendants, City of Philadelphia, et al. filed, in the office of the Clerk of the United States District Court for the Eastern District of Pennsylvania a verified Notice of Removal.

A copy of this Notice of Removal is attached hereto and is also being filed with the Clerk of the Court of Common Pleas of Philadelphia County, pursuant to Title 28, United States Code, Section 1446(e).


JEFFREY S. SIMONS
Assistant City Solicitor
Attorney I.D. No. 93784
1515 Arch Street, 14th Floor
Philadelphia, PA 19102

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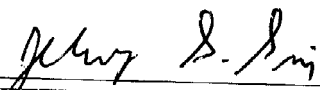
Redevelopment Authority
1234 Market St., 16th Flr., Phila., PA 19107

Defendants

CERTIFICATE OF SERVICE

I, Jeffrey S. Simons, Assistant City Solicitor do hereby certify that a true and correct copy of the attached Notice of Removal has been served upon the following by First Class Mail, postpaid, on the date indicated below:

TO: Vamsidhar R. Vurimindi
313 Arch St., Unit #607
Philadelphia, PA 19106


JEFFREY S. SIMONS
Assistant City Solicitor
Attorney I.D. No. 93784
1515 Arch Street, 14th Floor
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Date: 1/8/10